

CALIFORNIA CIVIL RIGHTS LAW GROUP

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DEMERIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON.

Plaintiffs,

V.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive.

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
LAWRENCE ORGAN IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

1 I, LAWRENCE A. ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Opposition to Defendant nextSource, Inc.'s Motion for Summary
6 Judgment. I have personal knowledge of the facts stated herein and if called upon to testify, I
7 could and would competently testify thereto, except as to those matters that are stated upon
8 information and belief.

9 2. Attached hereto and marked as Exhibit A are true and correct copies of
10 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000004.
11 Defendant marked this document as "confidential" pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 3. Attached hereto and marked as Exhibit B is a true and correct copy of various
14 excerpts from the deposition of Plaintiff Owen Diaz. Defendant marked this document as
15 "confidential" pursuant to the Protective Order and the document should therefore be sealed
16 pursuant to this Order.

17 4. Attached hereto and marked as Exhibit C are true and correct copies of documents
18 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000175 to
19 NS000178. Defendant marked this document as "confidential" pursuant to the Protective Order
20 and the document should therefore be sealed pursuant to this Order.

21 5. Attached hereto and marked as Exhibit D are true and correct copies of
22 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0001014
23 to TESLA-0001050. Defendant marked this document as "confidential" pursuant to the
24 Protective Order and the document should therefore be sealed pursuant to this Order.

1 6. Attached hereto and marked as Exhibit E are true and correct copies of documents
2 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000667 to TELSA-
3 0000671. Defendant marked this document as “confidential” pursuant to the Protective Order
4 and the document should therefore be sealed pursuant to this Order.

5 7. Attached hereto and marked as Exhibit F is a true and correct copy of a document
6 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000333. Defendant
7 marked this document as “confidential” pursuant to the Protective Order and the document
8 should therefore be sealed pursuant to this Order.

9 8. Attached hereto and marked as Exhibit G are true and correct copies of
10 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000108
11 to NS000111. Defendant marked this document as “confidential” pursuant to the Protective
12 Order and the document should therefore be sealed pursuant to this Order.

13 9. Attached hereto and marked as Exhibit H are true and correct copies of
14 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000095
15 to NS000100. Defendant marked this document as “confidential” pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 10. Attached hereto and marked as Exhibit I is a true and correct copy of a document
18 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000510. Defendant
19 marked this document as “confidential” pursuant to the Protective Order and the document
20 should therefore be sealed pursuant to this Order.

21 11. Attached hereto and marked as Exhibit J is a true and correct copy of a document
22 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000511. Defendant
23 marked this document as “confidential” pursuant to the Protective Order and the document
24 should therefore be sealed pursuant to this Order.

1 12. Attached hereto and marked as Exhibit K are true and correct copies of
2 documents produced by Defendant Telsa, Inc. in discovery and Bates stamped TESLA-0000314
3 to TESLA-0000316. Defendant marked this document as “confidential” pursuant to the
4 Protective Order and the document should therefore be sealed pursuant to this Order.

5 13. Attached hereto and marked as Exhibit L is a true and correct copy of various
6 excerpts from the deposition of Plaintiff Demetric Di-Az. Defendant marked this document as
7 “confidential” pursuant to the Protective Order and the document should therefore be sealed
8 pursuant to this Order.

9 14. Attached hereto and marked as Exhibit M is a true and correct copy of various
10 excerpts from the deposition of Plaintiff Lamar Patterson. Defendant marked this document as
11 “confidential” pursuant to the Protective Order and the document should therefore be sealed
12 pursuant to this Order.

13 15. Attached hereto and marked as Exhibit N are true and correct copies of
14 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0001003
15 to TESLA-0001005. Defendant marked this document as “confidential” pursuant to the
16 Protective Order and the document should therefore be sealed pursuant to this Order.

17 16. Attached hereto and marked as Exhibit O is a true and correct copy of a document
18 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000060. Defendant
19 marked this document as “confidential” pursuant to the Protective Order and the document
20 should therefore be sealed pursuant to this Order.

21 17. Attached hereto and marked as Exhibit P is a true and correct copy of a document
22 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000626. Defendant
23 marked this document as “confidential” pursuant to the Protective Order and the document
24 should therefore be sealed pursuant to this Order.

1 18. Attached hereto and marked as Exhibit Q are true and correct copies of
2 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000138
3 to NS000139. Defendant marked this document as “confidential” pursuant to the Protective
4 Order and the document should therefore be sealed pursuant to this Order.

5 19. Attached hereto and marked as Exhibit R are true and correct copies of documents
6 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates stamped CITISTAFF-
7 0000050 to CITISTAFF-0000055. Defendant marked this document as “confidential” pursuant
8 to the Protective Order and the document should therefore be sealed pursuant to this Order.

9 20. Attached hereto and marked as Exhibit S are true and correct copies of documents
10 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000038 to
11 NS000045. Defendant marked this document as “confidential” pursuant to the Protective Order
12 and the document should therefore be sealed pursuant to this Order.

13 21. Attached hereto and marked as Exhibit T are true and correct copies of documents
14 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000095 to
15 NS000100. Defendant marked this document as “confidential” pursuant to the Protective Order
16 and the document should therefore be sealed pursuant to this Order.

17 22. Attached hereto and marked as Exhibit U is a true and correct copy of a document
18 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000014. Defendant
19 marked this document as “confidential” pursuant to the Protective Order and the document
20 should therefore be sealed pursuant to this Order.

21 23. Attached hereto and marked as Exhibit V are true and correct copies of
22 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates stamped
23 CITISTAFF-0000009 to CITISTAFF-0000010. Defendant marked this document as
24

1 "confidential" pursuant to the Protective Order and the document should therefore be sealed
2 pursuant to this Order.

3 24. Attached hereto and marked as Exhibit W are true and correct copies of
4 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000321
5 to TESLA-0000323. Defendant marked this document as "confidential" pursuant to the
6 Protective Order and the document should therefore be sealed pursuant to this Order.
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8 25. Attached hereto and marked as Exhibit X is a true and correct copy of a document
9 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000317. Defendant
10 marked this document as "confidential" pursuant to the Protective Order and the document
11 should therefore be sealed pursuant to this Order.
12

13 26. Attached hereto and marked as Exhibit Y is a true and correct copy of a document
14 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000905. Defendant
15 marked this document as "confidential" pursuant to the Protective Order and the document
16 should therefore be sealed pursuant to this Order.
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20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed on November 19, 2019 in San Anselmo, California.
22
23

24 DATED: November 19, 2019

25 By: /s Lawrence Organ
26 Lawrence A. Organ, Esq.
27 Navruz Avloni, Esq.
28 J. Bernard Alexander, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ